

FILED 05 MAR '14 13:16 USDC-ORP

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**CASE NO. 3:14-cr-00099-KI**

**v.**

**INDICTMENT**

**MARIO CASTRO-GONZALEZ,  
a.k.a. "Shorty,"**

**18 U.S.C. §§ 922(g)(1), 924(a)(2),  
924(c) and 924(d)**

**Defendant.**

**21 U.S.C. §§ 841(a)(1),  
841(b)(1)(A) and 853**

**28 U.S.C. § 2461(c)**

**THE GRAND JURY CHARGES:**

**Count 1**

**[Possession with the Intent to Distribute Methamphetamine]**

On or about February 18, 2014, in the District of Oregon, **MARIO CASTRO-GONZALEZ, a.k.a. "Shorty,"** defendant herein, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**Count 2**  
**[Possession with the Intent to Distribute Heroin]**

On or about February 18, 2014, in the District of Oregon, **MARIO CASTRO-GONZALEZ, a.k.a. "Shorty,"** defendant herein, did knowingly and intentionally possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**Count 3**  
**[Possession of a Firearm in Furtherance of a Drug Trafficking Crime]**

On or about February 18, 2014, in the District of Oregon, **MARIO CASTRO-GONZALEZ, a.k.a. "Shorty,"** defendant herein, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute methamphetamine and heroin, in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts 1 and 2, did knowingly possess one or more of the following firearms, to-wit:

- A. Charter Arms (AR-7 Explorer) .22 Long Rifle, serial number A224941;
- B. Glock (27gen4) .40 caliber semi-automatic handgun, serial number RLH080;
- C. Jennings Firearms (Bryco Arms) .380 caliber semi-automatic handgun, serial number 1184965;
- D. Savage Arms 7mm rifle, Model 1111, serial number G904696;
- E. Marlin rifle .22 caliber, Model 25MN, serial number 02325122;
- F. Six Corp rifle, unknown caliber, serial number 8802826;
- G. Norinco rifle 7.62 caliber, Model SKS, serial number 2202044; and,

- H. Jennings Firearms .22 caliber semi-automatic handgun, Model J22, serial number 125358,

all in violation of Title 18, United States Code, Section 924(c).

**Count 4**  
**[Felon in Possession of a Firearm]**

On or about February 18, 2014, in the District of Oregon, **MARIO CASTRO-GONZALEZ, a.k.a. "Shorty,"** defendant herein, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically: Possession with the Intent to Distribute Methamphetamine, on or about November 30, 2001, in the United States District Court for the District of Oregon, Case Number CR 01-30025-01-HO, did knowingly and unlawfully possess one or more of the following firearms, to-wit:

- A. Charter Arms (AR-7 Explorer) .22 Long Rifle, serial number A224941;
- B. Glock (27gen4) .40 caliber semi-automatic handgun, serial number RLH080;
- C. Jennings Firearms (Bryco Arms) .380 caliber semi-automatic handgun, serial number 1184965;
- D. Savage Arms 7mm rifle, Model 1111, serial number G904696;
- E. Marlin rifle .22 caliber, Model 25MN, serial number 02325122;
- F. Six Corp rifle, unknown caliber, serial number 8802826; and,
- G. Norinco rifle 7.62 caliber, Model SKS, serial number 2202044; and,
- H. Jennings Firearms .22 caliber semi-automatic handgun, Model J22, serial number 125358,

which had previously been transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**Criminal Forfeiture Allegation:**  
**[Narcotics Offense]**

Upon conviction of a controlled substance offense listed above in Count 1 and Count 2, **MARIO CASTRO- GONZALEZ, a.k.a. "Shorty,"** defendant herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including, but not limited to:

- A. Charter Arms (AR-7 Explorer) .22 Long Rifle, serial number A224941;
- B. Glock (27gen4) .40 caliber semi-automatic handgun, serial number RLH080;
- C. Jennings Firearms (Bryco Arms) .380 caliber semi-automatic handgun, serial number 1184965;
- D. Savage Arms 7mm rifle, Model 1111, serial number G904696;
- E. Marlin rifle .22 caliber, Model 25MN, serial number 02325122;
- F. Six Corp rifle, unknown caliber, serial number 8802826;
- G. Norinco rifle 7.62 caliber, Model SKS, serial number 2202044; and,
- H. Jennings Firearms .22 caliber semi-automatic handgun, Model J22, serial number 125358,
- I. \$980.00 in United States Currency.

and all the ammunition associated with the firearms.

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**Criminal Forfeiture Allegation**  
**[Firearm Offense]**

Upon conviction of a firearm offense alleged above in Count 3 and Count 4, **MARIO CASTRO- GONZALEZ, a.k.a. "Shorty,"** defendant herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), the firearms involved in that offense, to-wit:

- A. Charter Arms (AR-7 Explorer) .22 Long Rifle, serial number A224941;
- B. Glock (27gen4) .40 caliber semi-automatic handgun, serial number RLH080;
- C. Jennings Firearms (Bryco Arms) .380 caliber semi-automatic handgun, serial number 1184965;
- D. Savage Arms 7mm rifle, Model 1111, serial number G904696;
- E. Marlin rifle .22 caliber, Model 25MN, serial number 02325122;
- F. Six Corp rifle, unknown caliber, serial number 8802826;
- G. Norinco rifle 7.62 caliber, Model SKS, serial number 2202044; and,

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H. Jennings Firearms .22 caliber semi-automatic handgun, Model J22, serial number 125358,

I. \$980.00 in United States Currency.

and all the ammunition associated with the firearms.


DATED this 5 day of March 2014.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL, OSB # 953473  
United States Attorney  
District of Oregon

  
SCOTT M. KERIN, OSB # 965128  
Chief, Drug Unit  
Assistant United States Attorney